Remarks

A.   Background

The Office Action states that claims 1-17 have been withdrawn from consideration; Claims 18-24 remain pending and new claims 25-33 have been added. In regards to claims 18-20, the Office Action asserts an obviousness rejection against them as being unpatentable over Andrews et al. (*Andrews*) U.S. Patent No. 5,835,723 in view of Shaio (*Shaio*) U.S. Patent No. 6,487,167 in view of Hamner et al. (*Hamner*) U.S. Patent No. 5,960,439 in further view of Wanderer et al. (*Wanderer*) U.S. Patent No. 5,491,796. With respect to claims 21-24, the Office Action asserts an obviousness rejection against them based on the same four prior art references (*Andrews*, *Shaio*, *Hamner*, and *Wanderer*) in further view of Hemphill et al. (*Hemphill*) U.S. Patent No. 6,167,448.

In light of the following remarks, Applicants respectfully traverse the Office Action's rejections and request reconsideration of claims 18-33 of the pending U.S. Patent application.

B.   Patentability of the Claims

Paragraph 6 of the Office Action asserts a 35 U.S.C. § 103(a) rejection against claim 18 as being unpatentable over *Andrews* in view of *Shaio* in view of *Hamner* and in further view of *Wanderer*. The 35 U.S.C. § 103(a) rejection of claims 18-20 are respectfully traversed for at least the following reason: the prior art references, singularly and as a combination, do not teach or suggest a "description means responsive to a description request received by the computing device on the ad hoc network for sending a description message defining interaction via data messaging with the computing device to remotely operate the computing device over the ad hoc network" as recited in claim 18 of the pending patent application. Therefore, the invention recited in the patent application is not rendered obvious.

In order to establish a *prima facie* case of obviousness, the basic criteria is that the cited prior art references must expressly or impliedly suggest all elements of the claimed invention, or, alternatively, the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. (MPEP § 2144). The initial burden of proof is on the Office to support a conclusion that the claimed invention is directed to obvious subject matter. (MPEP § 2144.09).

Prior Art Does Not Teach the Claimed Invention

Applicants respectfully traverse the obviousness rejection since not every element of the claimed invention is taught by the prior art. Paragraph 6 of the Office Action states that "*Wanderer* teaches responsive to poll request received by the computing device for attributes which may be viewed are defined by a file defining user-selectable interactions options associated with available function for remotely configuring the computing device over the network." However, the Office Action fails to appreciate key differences between the cited reference and the claimed invention, namely, *Wanderer* does not teach the "description means responsive to a description request received by the computing device on the ad hoc network for sending a description message defining interaction via data messaging with the computing device to remotely operate the computing device over the ad hoc network" recited in claim 18.

In one implementation of the claimed invention, "a device connectivity and control model provides an integrated set of addressing, naming, discovery and description processes (herein also termed "self-bootstrapping") that enables automatic, dynamic and ad-hoc self-setup by devices to interoperate with other devices on a network. This permits a computing device when introduced into a network to automatically configure so as to connect and interact with other computing devices available on the network, without a user installation experience and without downloading driver software or persisting a configuration setup for connecting and interacting with such other computing devices. Upon completing interaction with such other devices, the computing device automatically releases the setup for such other devices so as to avoid persistent device configurations that might create a configuration maintenance and management burden." (Specification page 4, lines 16-26 – page 5, lines 1-2). Hence, according to one implementation of the claimed invention, any networked device may initiate the "interaction via data messaging" with any other networked device without having established a prior relationship or maintaining a persistent relationship between the devices.

Wanderer, on the other hand, describes a centralized system for dispensing information. "The present invention provides a network management system in which various elements, such as hubs, routers, workstations, etc., distributed across a data exchange network are remotely controlled from a single point of maintenance." (*Wanderer*, col. 2, lines 32-36). In order to control the attached devices, the *Wanderer* system maintains a centralized database that is consistently updated with new information. *Wanderer* states that "[t]he

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existence of a database in which values reside and from which these values can be retrieved is provided as part of the architecture." (*Wanderer*, col. 24, lines 31-34). Hence, unlike the claimed invention, *Wanderer* maintains a centralized database to monitor and manage attached devices, which means that persistent relationships between devices are necessary. (See *Wanderer*, col. 3, lines 55-67 and col. 33, lines 66-67 – col. 34, lines 28-60). These relationships create configuration management concerns and waste unnecessary device and network resources, two issues the claimed invention specifically avoids. (See Specification, page 3, lines 25-27). More importantly, the centralized system of *Wanderer* does not support the "automatic, dynamic and ad-hoc self-setup" of devices as taught by the claimed invention.

One feature of *Wanderer* is a programming language to define device specifications. (*Wanderer*, col. 40, lines 10-11). In *Wanderer*, programs are written by users in a device specification language which are compiled and converted into device specification files. These files are located in one or more directories on the management computer (*Wanderer*, col. 7, lines 51-55). "[The *Wanderer*] engine reads the agent specification created by the compiler and produces a view of the agent for remote management at a management location." (*Wanderer*, col. 3, lines 42-45). Hence, *Wanderer* describes an architectural model that requires an immense knowledge of the underlying network devices to program and configure device files that work properly. Furthermore, the device files themselves are centrally located, which means that there is only one central management location. *Wanderer* clearly differs from the "description means responsive to a description request . . . for sending a description message defining interaction via data messaging with the computing device to remotely operate the computing device over the ad hoc network" as recited in claim 18.

For example, in one implementation of the claimed, the configuration process "is driven entirely from the device itself and is accomplished entirely by uploading an XML document that describes the capabilities of the device." (See Specification, page 12, lines 19-21). The claimed invention provides a much richer and simpler framework than *Wanderer* alone or in combination with any of the other cited prior art references. Because of these differences, one of ordinary skill upon reading *Andrews, Shaio, Hamner*, and *Wanderer* would not be led to configure a "description means" such as the one recited in claim 18.

Thus, Applicants respectfully traverse the obviousness rejection and submit that claim 18 is allowable and earnestly seek such action. Claims 19 and 20 depend from claim

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18. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 18-20 are not obvious over *Andrews* in view of *Shaio* in view of *Hamner* in further view of *Wanderer* for at least the reasons set forth above.

Claims 21-24 also depend from claim 18. They were rejected under *Andrews*, *Shaio*, *Hamner*, and *Wanderer* in further view of *Hemphill*. For similar reasons to those stated above, Applicants submit that claims 21-24 are not obvious over *Andrews* in view of *Shaio* in view of *Hamner* in view of *Wanderer* in further view of *Hemphill*.
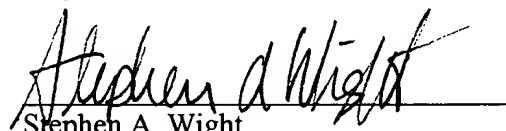
C.   Conclusion

For at least the foregoing reasons, Applicants submit that the rejection under 35 U.S.C. § 103(a) has been overcome. Therefore, claims 18-33 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Respectfully submitted,

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